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Proposed Co-Lead Counsel for Movant Arman Anvari and the Class

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

BRUCE MACDONALD, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

DYNAMIC LEDGER SOLUTIONS, INC., a
Delaware corporation, TEZOS STIFTUNG, a
Swiss Foundation, KATHLEEN BREITMAN,
an Individual, ARTHUR BREITMAN, an
Individual, TIMOTHY COOK DRAPER, an
Individual, DRAPER ASSOCIATES, JOHANN

Case No. 3:17-cv-07095-RS

**REPLY DECLARATION OF HUNG G. TA
IN FURTHER SUPPORT OF ARMAN
ANVARI'S MOTION FOR
APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF COUNSEL**

CLASS ACTION

1 GEVERS, DIEGO PONZ, GUIDO SCHMITZ-
2 KRUMMACHER, BITCOIN SUISSE AG,
3 NIKLAS NIKOLAJSSEN, and DOES 1-100,
4 INCLUSIVE,

5 Defendants.

Judge: Hon. Richard Seeborg
Courtroom: 3, 17TH Floor

6 GGCC, LLC, an Illinois Limited Liability
7 Company, Individually and on Behalf of All
8 Others Similarly Situated,

9 Plaintiff,

10 v.

11 DYNAMIC LEDGER SOLUTIONS, INC., a
12 Delaware corporation, TEZOS STIFTUNG, a
13 Swiss Foundation, KATHLEEN BREITMAN,
14 an Individual, ARTHUR BREITMAN, an
15 Individual,

16 Defendants.

17 ANDREW OKUSKO, individually and on
18 behalf of all others similarly situated,

19 Plaintiff,

20 v.

21 DYNAMIC LEDGER SOLUTIONS, INC.,
22 THE TEZOS FOUNDATION, KATHLEEN
23 BREITMAN, ARTHUR BREITMAN, and
24 TIMOTHY DRAPER,

25 Defendants.

26 ANDREW BAKER, individually and on behalf
27 of all others similarly situated,

28 Plaintiff,

v.

DYNAMIC LEDGER SOLUTIONS, INC., a
Delaware Corporation, TEZOS STIFTUNG, a
Swiss Foundation, KATHLEEN BREITMAN,
an individual, ARTHUR BREITMAN, an
individual, JOHANN GEVERS, an individual,
STRANGE BREW STRATEGIES, LLC, a
California limited liability company, and DOES
1 through 100 inclusive,

Defendant.

Case No: 3:17-cv-06779-RS

Case No: 3:17-cv-06829-RS

Case No. 3:17-cv-06850-RS

1 I, Hung G. Ta, declare under penalty of perjury as follows:

2 1. I am the principal of the law firm Hung G. Ta, Esq. PLLC (“HGT Law”), proposed
3 Lead Counsel for the putative class in the above-captioned action (the “Action”) and counsel to
4 proposed Lead Plaintiff Arman Anvari. I am an active member in good standing of the bar of the
5 State of New York and will apply to be admitted *pro hac vice* in this matter. I submit this
6 declaration in further support of Arman Anvari’s Motion for Appointment as Lead Plaintiff and
7 Approval of Counsel.

8 2. I have practiced law in the United States for approximately 18 years. Immediately
9 prior to practicing law in the United States, I clerked for Justice Mary Gaudron of the High Court of
10 Australia.

11 3. I founded HGT Law in 2011. Prior to that, I was employed for approximately four
12 years at Grant & Eisenhofer P.A. Before working at Grant & Eisenhofer P.A., I was employed at
13 Milbank Tweed Hadley & McCloy LLP.

14 4. During my employment at Grant & Eisenhofer P.A., I handled the following
15 securities class actions from inception through obtaining court-approved settlements:

- 16 • *In re Am. Dental Partners, Inc. Sec. Litig.*, No. 08-cv-10119-RGS (D. Mass.)
- 17 • *In re Shuffle Master, Inc. Sec. Litig.*, No. 2:07-cv-00715-KJD-RJJ (D. Nev.)

18 5. I also worked on other securities class actions, including *In re Stone & Webster, Inc.*
19 *Sec. Litig.*, No. 00-10874-RWZ (D. Mass.) and a proposed class action against The Goldman Sachs
20 Group, Inc.

21 6. Since founding HGT Law, the attorneys of HGT Law have brought direct (opt-out)
22 securities litigation cases on behalf of investors, including the following lawsuits against Dendreon
23 Corporation and Valeant Pharmaceuticals International Inc.:

- 24 • *Bolling v. Gold*, No. 13-00872 (W.D. Wash.)
- 25 • *Colonial First State Investments Limited v. Valeant Pharmaceuticals*
26 *International, Inc.*, No. 18-cv-00383 (D. N.J.)
- 27 • *Ahuja v. Valeant Pharmaceuticals International, Inc.*, No. 18-cv-00846 (D. N.J.).

28 7. Additionally, my colleague JooYun Kim and I were both previously employed at

1 Milbank Tweed Hadley & McCloy LLP, where we defended multiple securities class actions,
 2 including: *In re Bristol-Myers Squibb Sec. Litig.*, No. 02-civ-2251 (S.D.N.Y.); *Sedighim v.*
 3 *Donaldson, Lufkin & Jenrette, Inc.*, No. 00-civ-7351 (S.D.N.Y.); *Franze v. Equitable Assurance*,
 4 No. 01-11575 (11th Cir.); *Newby v. Enron Corp. (In re Enron Corp. Sec., Derivative & ERISA*
 5 *Litig.)*, C.A. Nos. H-01-3624 and H-03-2345 (S.D. Tex.); *Liu v. Credit Suisse First Boston Corp.*
 6 *(In re Initial Public Offering Sec. Litig.)*, MDL 1554 (S.D.N.Y.); *In re Salomon Smith Barney*
 7 *Mutual Fund Fees Litig.*, No. 04-4055 (S.D.N.Y.); *Tracinda Corp. v. DaimlerChrysler AG (In re*
 8 *DaimlerChrysler AG Sec. Litig.)*, Nos. 00-993, 00-981, 01-004 (D. Del.); and *Buxbaum v. Deutsche*
 9 *Bank AG*, No. 98 Civ. 8460 (S.D.N.Y.).

10 8. Attached as Exhibit A is the Hagens Berman webpage discussing the Tezos class
 11 action, and specifically referring readers to the *MacDonald* action.

12 I declare under penalty of perjury that the foregoing is true and correct, this 15th day of
 13 February, 2018.

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 15 /s/ Hung G. Ta
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